

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:

Luke W. Aaron and Alisha M. Aaron, Debtors

Bankruptcy No.: 20-20180-CMB
Chapter 13

Luke W. Aaron and Alisha M. Aaron, Debtors

v.

U.S. Bank Trust, National Association. and
Ronda L. Winnecour, Chapter 13 Trustee, Respondents

DEBTORS' DECLARATION REGARDING MORTGAGE PAYMENT CHANGE

AND NOW, come the Debtors/Movants Luke W. Aaron and Alisha M. Aaron, by and through their counsel Michael S. Lazaroff, Esquire, and respectfully represent as follows:

1. Respondent U.S. Bank Trust, National Association filed a *Notice of Mortgage Payment Change* in the above captioned Chapter 13 case.
2. Debtors and undersigned counsel hereby declare that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt because there is a significant surplus in the Plan balance which is more than sufficient to cover the increase in the mortgage escrow payment.

Respectfully submitted,

/s/ Michael S. Lazaroff

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